

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

TECSEC, INCORPORATED,)
)
)
Plaintiff)
)
)
v.) Case No. 1:10cv115
) (LMB/TCB)
INTERNATIONAL BUSINESS MACHINES)
CORPORATION, *et al.*,)
)
Defendants)

**DEFENDANT IBM'S
EMERGENCY MOTION TO ENFORCE**

Pursuant to Federal Rule 37(b), Defendant International Business Machines Corporation (“IBM”) moves the Court to enter an order enforcing the *Stipulated Protective Order* (Dkt. No. 210) and Court’s directives from the bench on September 10, 2010 regarding access by plaintiff’s outside counsel to IBM’s source code and other Highly Confidential materials.

IBM requests an emergency telephonic hearing on this motion.

Certificate: I hereby certify that a good faith effort was made by the movant to resolve this dispute without court intervention.

Dated: September 15, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September 2010, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record:

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